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*Attorneys for Defendant Peng Yan,  
Individually and as Personal Representative  
of the Estate of Armand L. Greenhall*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SECURITIES INVESTOR PROTECTION :  
CORPORATION, :  
:

Plaintiff-Applicant, :  
:

v. :  
:

BERNARD L. MADOFF INVESTMENT :  
SECURITIES, LLC, :  
:

Defendant. :  
-----X

In re: :  
:

BERNARD L. MADOFF, :  
:

Debtor. :  
-----X

IRVING H. PICARD, Trustee for the Liquidation :  
Of Bernard L. Madoff Investment Securities LLC, :  
:

Plaintiff, :  
:

v. :  
:

ESTATE OF ARMAND L. GREENHALL, :  
PENG YAN, individually and as Personal :  
Representative of the Estate of Armand L. :  
Greenhall, DEIDRE SWEENEY, as Personal :  
Representative of the Estate of Armand L. :  
Greenhall, :  
:

Defendants. -----X

SIPA LIQUIDATION

No. 08-01789 (SMB)

Adv. Pro. No. 10-ap-5048 (SMB)

**AFFIRMATION OF IN SUPPORT OF  
OPPOSITION TO MOTION FOR LEAVE TO AMEND**

Mary Grace White, an attorney duly admitted to practice law before this Court and the Courts of the State of New York, affirms as follows under penalty of perjury:

1. I am an attorney associated with Lax & Neville LLP ("Lax & Neville"), counsel for Defendant Peng Yan. I submit this Affirmation in support of Mr. Yan's opposition to the Trustee's Motion for Entry of an Order Pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as Incorporated by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, Granting the Trustee Leave to File a Second Amended Complaint and for Related Relief ("Motion to Amend").

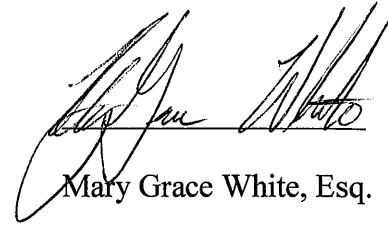
2. On May 30, 2017, the Parties agreed "to extending discovery for an additional 3 month period following the mediator's failed mediation report." The email correspondence confirming this agreement is attached hereto as Exhibit A.

3. On July 22, 2016, I sent an email to counsel for the Trustee attaching documents Bates stamped "Yan Production 000014-000486" and an accompanying letter. A copy of the email and letter are attached hereto as Exhibit B.

4. On or about July 28, 2016, Lax & Neville received three disks of documents from Defendant Deidre Sweeney, which included the documents attached as Exhibits E, F, G, H, I, and J to the Trustee's proposed Second Amended Complaint. A copy of the letter accompanying the documents, addressed to counsel for the Trustee, is attached hereto as Exhibit C.

5. On December 18, 2015, Lax & Neville sent an email to counsel for the Trustee attaching Defendant Peng Yan's Initial Disclosures, which included documents Bates stamped "Yan Production 000001-000013". A copy of the email is attached hereto as Exhibit D.

Dated: New York, NY  
March 23, 2018



Mary Grace White, Esq.